

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

MELISSA KASHANCHI

Plaintiff,

vs.

Case No.

ANDREW SAUL
COMMISSIONER OF SOCIAL SECURITY,

Defendant,

RONALD D. HONIG (00790191)
Attorney for Plaintiff
9400 N. Central Expwy., Suite 1205
Dallas, TX 75231
(214) 368-0777

COMPLAINT

NOW COMES MELISSA KASHANCHI, the Plaintiff herein, by and through her attorney, RONALD D. HONIG, and for this Complaint against the Defendant herein shows unto this Honorable Court the following:

1. The Jurisdiction of this Court is sought under the provisions of Title 42 Sections 1383(c)(3) and 205 (g), United States Code (42 U.S.C.A. Sec. 1383© (3) and 405 (g)), and constitutes an appeal from the decision of the Administrative Law Judge of the Social Security Administration, holding that Plaintiff is not prevented from engaging in any substantial gainful activity for any continuous period which lasted or could be expected to last for at least twelve months, and that Plaintiff was not under a "Disability" as defined by the Social Security Act, as amended.

2. This action is commenced within the appropriate time period set forth in the Notice of Appeals Council Action dated July 10, 2019.

3. Plaintiff avers that she has exhausted all of the administrative remedies prior to the filing of this appeal.

4. Plaintiff's denial of request to the office of the Appeals Council, Social Security Administration, was styled: In the Case of MELISSA KASHANCHI'S claim for a period of disability, disability insurance benefits and Supplemental Security Income.

5. That this Action is instituted in the U. S. District Court for the District in which Plaintiff resides. Plaintiff resides in Alton, TX 78573.

6. That the Defendant is the duly appointed Commissioner of Social Security of the United States of America.

7. That the conclusions and findings of fact of the Administrators were not supported by substantial evidence and were contrary to the law.

8. That the medical evidence was not properly considered by the Commissioner and insufficient vocational evidence was presented to sustain the Commissioner's burden of proof, and as such, the Commissioner's decision is not supported by substantial evidence.

9. Plaintiff is entitled to relief under the Social Security Act and Regulations due to a combination of impairments.

WHEREFORE, your Plaintiff prays that this Honorable Court modify the findings of the Administration herein and find that the Plaintiff is entitled to a period of disability and disability insurance benefits under the provisions of the Social Security Act, as amended.

Respectfully submitted,

s/ Ronald D. Honig
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